

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2016 JUN -9 PM 3: 02

UNITED STATES OF AMERICA

v.

WILLIAM ALLEN,  
Defendant.

CLERK  
BY   
DEPUTY CLERK

No. 5:15-cr-97-1

SECOND SUPERSEDING INDICTMENT

COUNTS ONE TO EIGHT

The Grand Jury charges that:

In or about May 2014, in the District of Vermont, defendant WILLIAM ALLEN knowingly received visual depictions of a minor engaging in sexually explicit conduct using a means and facility of interstate and foreign commerce, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct, as follows:

Count	File Name
1	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (34).jpg
2	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (87).jpg
3	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (53).jpg
4	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (112).jpg
5	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (35).jpg

6	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (19).jpg
7	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (88)(1).jpg
8	2011 PTHC Falko AWESOME 7yo and 8yo Child porn (80).jpg

(18 U.S.C. § 2252(a)(2))

COUNT NINE

The Grand Jury further charges that:

On or about May 16, 2014, in the District of Vermont, the defendant, WILLIAM ALLEN, knowingly distributed visual depictions using a means and facility of interstate and foreign commerce, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(18 U.S.C. § 2252(a)(2))

## COUNT TEN

The Grand Jury further charges:

In or about June 2014, in the District of Vermont, defendant WILLIAM ALLEN knowingly possessed matters which contained visual depictions, to wit:

- [0] 未成年 幼 幼女 Young Loli Lolita 6Yo 7Yo 8Yo 430(1).jpg
- Ptsc 9Yo Jenny In Nylons And Collar Tied up.jpg
- Pthc\_Frifam – Viola\_07009.jpg
- pthc Sweet Little Girl Sabine R@Ygold Harry Potter 9Yo Young Lsm Baby 169.jpg
- Private Daughter Mellony (10yo) 05.jpg
- Private Daughter Mary PTHC made (stolen Pedo Lolita Kinder Child Lolita Hussyfan Preteen Kid (5y) 12.jpg
- Private Daughter Mary PTHC nude (stolen Pedo Lotita kinder Child Lolita Husfan preteen kid (5y) 16.jpg
- Pictures From Ran Tor Dloaded In 2009 – Kdv kidzilla Toddlers 0yo 2yo 3yo 4yo 5yo 6yo 9yo Tara Babyj(71).jpg
- Imgsr Ru Pthc Pedo Babyshivid Childlover Private Daughter Torpedo Ranchi Lolita – 100 1990.jpg
- Aabbccdde kinderficker Nackt Fotos Von kleinen Madchen --- Eine Tochter Zum Ficken (39).jpg
- aabbccdde --- nackte Madchen die Papis kinderficker – Sch.jpg
- k@Ty Pthc First – 18 3Yo Kleuterkutje (18).jpg

- 10Yo\_Angelita – computer room naked pussy show.jpg
- (Kleuterkutje) (Frifam) This Babyj (口リ一タ)(洋炉)(無修正)欧美 幼 5Yo.rmvb
- (pthc opva 2013 2014) pthc Swiss German 2013 MVI\_0084 8yo fullsex.mpg

that had been shipped and transported using any means and facility of interstate and foreign commerce, and shipped and transported in and affecting interstate and foreign commerce, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(18 U.S.C. § 2252(a)(4))

COUNT ELEVEN

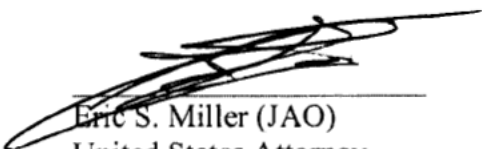
The Grand Jury further charges:

In or about April 2015, in the District of Vermont, defendant WILLIAM ALLEN knowingly caused Kerissa Allen's possession of at least one matter which contained visual depictions that had been shipped and transported using any means and facility of interstate and foreign commerce, and shipped and transported in and affecting interstate and foreign commerce, where the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(18 U.S.C. §§ 2252(a)(4), 2)

A TRUE BILL



  
Eric S. Miller (JAO)  
United States Attorney  
Burlington, Vermont  
June 9, 2016